

REMARKS**The Claimed Invention**

The independent claims now pending in the application are claims 1, 4, and 28. The three independent claims are all directed to a product comprised of a three-dimensional substrate coated with a thin layer of 100 percent solids material applied uniformly. The claims vary in certain respects. For example, claim 1 recites a "thin film layer of coating that is 0.001 inches or less thick," that is applied uniformly on a three-dimensional substrate. Claim 4 recites a product formed by a process that provides "a uniform thin film coating of said coating material on said three-dimensional substrate." Claim 28 recites a multi-layer composite coating comprised of one hundred percent solids material "to form said thin film that is approximately .001 inches or less thick on the three-dimensional substrate."

All of these independent claims recite a product that is comprised of a three-dimensional substrate. As indicated in paragraph 3 of Mr. Hagopian's declaration ("Hagopian Decl."), an example of a three-dimensional substrate is illustrated in Figure 1 of the application and includes items that have edges, grooves, corners or other contoured or recessed areas that are difficult to coat. For example, the three-dimensional substrate illustrated in Figure 1 is a cabinet door with various contours, recessed areas and corners in its surface. As understood in the coatings industry, three-dimensional substrates do not include flat, two-dimensional substrates such as flat paneling for walls, plywood sheets and wood flooring. Hagopian Decl., ¶¶ 3, 4. As understood in the art of coatings, a three-dimensional substrate is a substrate in which the distance between the surface of the substrate and the coating application device, such as a spray gun, varies over the substrate as the coating is applied. This is because the surface of the three-dimensional substrate is not a substantially flat surface. In contrast, a two-dimensional substrate is a substrate in which the distance between the surface of the substrate and the coating application device is substantially constant during coating application. Hagopian Decl., ¶ 4.

Hasenour '535 recognizes the commonly understood meanings and differences between the meanings of "two-dimensional substrate" and "three-dimensional substrate" as used in the coatings industry. See column 1, lines 60-63 where this patent states, "Roll coating processes can be used, but roll coating is limited to flat articles and cannot be used with three-dimensional

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articles such as contoured cabinet doors." This statement indicates that flat articles are not three-dimensional articles. Hagopian Decl., ¶ 5.

Prior to the invention, there has been no way to apply a thin, uniform coat of 100 percent solids coating to a three-dimensional substrate. Hagopian Decl., ¶ 7. A "thin film" is .2 mils to 2 mils in thickness. Prior products comprised of a three-dimensional substrate in which a thin film of 100% solids material has been applied resulted in blotchy, dry and uneven coatings and the coatings failed to enter areas not perpendicular to the point of dispensation of the coating. Accordingly, prior to the invention, a product that is comprised of a three-dimensional substrate having a one hundred percent solids coating applied uniformly to form a thin film layer of coating as recited in independent claims 1, 4 and 28 has not been achieved by conventional processes and techniques.

Rejections as to Claims 1-9, 15, 16, 19, 28-29

Claims 1-9, 15, 16, 19 and 28-29 stand rejected in view of Blazey '931 under 35 U.S.C. §102(b). Blazey '931 relates to applying a coating of 100 percent solids material to a substrate. However, in contrast to the invention, Blazey '931 only discloses applying coating to two-dimensional substrates such as flat paneling for truck-trailer doors. Blazey '931, Col. 2, lines 13-14; Col. 5, lines 33-48. Blazey '931 does not disclose applying a 100 percent solids coating to products comprised of three-dimensional substrates. Hagopian Decl., ¶ 6. Accordingly, Blazey '931 plainly does not anticipate claims 1-9, 15, 16, 19 and 28-29 which all require a product comprised of a three-dimensional substrate. For this reason, the Applicants respectfully request that the Examiner withdraw the rejection as to claims 1-9, 15, 16, 19 and 28-29. Applicants submit that these claims are allowable.

The Rejection of Claims 10-14, 17-18, 20-27

Claims 10-14, 17-18 and 20-27 stand rejected under 35 U.S.C. § 103 in view of Blazey '931 taken in view of Hasenour '535. These claims all depend from one of the independent claims 1 or 4 mentioned above. Accordingly, they all require a product comprised of a three-dimensional substrate to which a uniform coating of a thin film of 100 percent solids material is applied. As set forth above, Blazey '931 does not disclose applying a 100 percent solids coating to a three-dimensional substrate. Accordingly, for this reason above, the rejection as to claims

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10-14, 17-18 and 20-27 should be withdrawn.

The Applicants submit that all pending claims are now allowable.

Respectively submitted,

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